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Comments on the Interim Final Report of the Aquaculture Working Group - winter 2006

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General Comments

The proposed standards are generally in line with current standards from other jurisdictions. However, there are some exceptions for which I have provided comments. These comments are meant to be constructive and aid in the discussion of the development of organic standards for aquatic species.

A. The use of Triploids

205.251

(e) Production of triploid aquatic animals from the application of temperature or pressure shock after fertilization and by crossing tetraploids with diploids is prohibited for fish to be sold as organic.

This may be too restrictive. The use of triploid fish is often used as a conservation measure. Some jurisdictions have only allowed the use of triploid stocks for trout for example. Also there are some species, which can only be reared as triploids in some jurisdictions such as triploid grass carp. Triploids do occur naturally in most fish populations although at very low numbers. Triploids are NOT genetically modified organisms as per the classic definition of GMO. Triploids should be allowed in organic production.

B. Certification of wild Fish stocks

205.252

(f) All such fish meal or fish oil must be derived from fishery resources certified to be sustainably managed. Sustainability shall be determined using principles and criteria established by the Marine Stewardship Council or similar internationally recognized fisheries certification organizations.

Certification of a fishery by such an organization shall be recognized as compliance with this requirement.

The use of fish meal and fish oil from sustainable fisheries is one a key point for the use of wild derived fish meal and fish oil in feed for organic fish production.

However, the identification of the Marine Stewardship Council (MSC) body responsible the standard by which to set the sustainability principles and the criteria of a sustainable fishery is highly inappropriate. The MSC is essentially a private organization, which is governed by a relatively small board of directors many of whom have highly specialized interests, which do not necessarily give them knowledge, wisdom or unique insight into what makes a sustainable fishery. Organizations and institutions, which are either private businesses or large non-governmental organizations, fund the MSC. The funding sources could unduly influence the principles and criteria set by the MSC.

Further most of the world's fisheries are still in the public domain as part of a commons. The governance of the commons is usually the responsibility of an elected government who in turn is responsible to the electorate. The MSC is not responsible to an electorate but to a board of directors. Having a private sector "business" in this case the MSC set the principles and criteria for the governance of common property which is under the control

of sovereign nations is very undemocratic. The same lack of democratic process would also plague "similar internationally recognized fisheries certification organizations"

Because groups such as MSC are essentially private organizations using their trademarks to develop privileged access to markets there is a significant potential for market place distortions to occur and for groups like MSC to gain from the market place distortions it creates. This situation is essentially anti free market.

A more democratic and free market approach would be to have a group such as the Food and Agriculture Organization of the UN set the standards and principles. The UN is a much larger organization with a broader governance structure being responsible to the participating nations and therefore, in effect giving the participating nations a say in the principles and criteria resulting in a much more democratic process.

C. Use of Fish Meal and Fish Oil from Wild Sources

205.252

(g) Use of fish meal and fish oil derived from wild sources that are in compliance with(e) and (f) may qualify as organic under one of the following:

(1) Wild fish and other wild seafood, provided that use of such wild fish and wild seafood cannot exceed one pound of wild fish harvested for every pound of aquatic animals cultured.

(2) Carcasses, viscera, and trimmings from the processing of wild fish and other wild seafood that are destined for human consumption. The portions of processed wild fish destined for human consumption may not be certified or labeled as organic unless provide elsewhere in this rule.

The use of fish meal and fish oil from wild sources is highly restricted for use as a feed ingredient to grow fish yet there are no restrictions on the use of this wild fish resources for feeding crops as outlined in the NOP

205.601(7) below.

205.601

7) Liquid fish products - can be pH adjusted with sulfuric, citric or phosphoric acid. The amount of acid used shall not exceed the minimum needed to lower the pH to

3.5

There appears to be an irrational bias against the use of fish meal for aquaculture purposes.

D. Mammalian and Poultry Slaughter By-Products

There should be a provision for the use of mammalian and poultry byproducts if these byproducts are derived from organic sources. Many species of fish are carnivorous and feed naturally on small mammals and birds.

E. Aquaculture Health Care

There is no provision for the use of antibiotics for the treatment of disease. Most global standards for organic aquatic animal production allow for the treatment of disease with antibiotics with prolonged withdrawal periods. But none allow the prophylactic use of antibiotics or the use of antibiotics for growth promotion.

The use of antibiotics for disease treatment is included in most standards:

1 IFOAM (International Federation of Organic Agriculture Movements) 5.7.2. Where conventional veterinary medicines are used, the withholding period shall be at least double the legal period.

EU Regulation 1804/99 5.7 (European Union) 5.7. The withdrawal period between the last administration of an allopathic veterinary medicinal product to an animal under normal

conditions of use, and the production of organically produced foodstuffs from such animals, is to be twice the legal withdrawal period or, in a case in which this period is not specified, 48 hours CAN/CGB - 32.310-99 (Canada)

7.4.3 In cases where disease and health problems require treatment, the use of biological, cultural and physical treatments and/or practices are recommended. If no alternative treatment or management practice exists, substances for veterinary use, as described in appendix B, section B2, are permitted. If a veterinary drug treatment is used, the withdrawal period shall be at least double the permitted federal withdrawal period allowed for veterinary drugs. The withholding of necessary veterinary treatments in order to maintain the organic status of the affected animal is not permitted.

7.4.4 No products from livestock treated with synthetic antibiotics, parasitides, or other synthetic veterinary compounds not permitted in this standard, with the exception of vaccines, shall be labeled or marketed as certified organic, in accordance with this standard, until an interval of time that is at least double the permitted federal withdrawal period allowed for such veterinary compounds has been exceeded for the treated animal.

KRAV (Sweden)

5.4.10

For treatment with antibiotics and chemotherapeutics:- Double the withdrawal period laid down by the Swedish National Food Administration for the respective substance, however always at least 6 months Naturland II 5.51 Naturland Standards for Organic Aquaculture Use of conventional medicine is only permitted in vertebrates and after detailed diagnosis and remedial prescription by a veterinarian. In this case, at least twice the legally prescribed waiting period must be observed.

Codex Alimentarius GL 32 - 1999, Rev. 1 - 2001) APPENDIX 1B.22.c chemical allopathic veterinary drugs or antibiotics may be used under the responsibility of a veterinarian; withholding periods should be the double of that required by legislation with, in any case, a minimum of 48 hours Bio Suisse Standards 2001

3.1.11 Injured or sick animals must be treated. Natural remedies and healing methods have first priority, if experience shows that they have a therapeutical effect on the respective animal species or the disease that is to be treated. Chemical-synthetic allopathic treatments may be carried out on the veterinarian's prescription, if the disease or injury cannot be efficiently treated with alternative methods. The treatment must be recorded indelibly in the stable book.

Withdrawal periods

The withdrawal period between the last administering of a chemical-synthetic allopathic veterinary medicine and the marketing of foodstuff from such an animal amounts principally to the double of the legally stipulated time indicated on the package. Excepted are drugs for the draining of cows with udder problems. Before the use of draining agents, a bacteriological analysis of the milk must be carried out.

BFA5.1.3.(Biological Farmers of Australia) The use of prohibited allopathic veterinary treatments (such as drugs and antibiotics) or other treatments not listed or allowed under this Standard shall require prior written veterinary advice and shall lead to de-certification of stock, as listed in table 5a. Use of such substances shall require a quarantine period for such identified stock of three times the legal withholding period of the substance in question. Quarantine shall occur separate from certified stock and other certified areas as specified elsewhere in this Standard .

6.9.6.2 (Province of Quebec - Canada)

Conventional veterinary medicinal products may only be used on vertebrate organisms and only when there is no other justifiable alternative and if a federal or provincial law requires it. Animals may receive a maximum number of two veterinary treatments per year, with withdrawal periods being equivalent to at least twice the prescribed periods long as that required or two weeks, whichever is longer. If the number of treatments exceeds the established limit, the animal must undergo a conversion period as defined in the standards

